

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

- v -

07 CR 225-01 (KMK)

CHARLES WELLS,

Defendant.

SENTENCING MEMORANDUM: Supplemental Character Letters

DUANE MORRIS LLP
Gregory P. Gulia
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Attorneys for Defendant Charles Wells

Defendant Charles Wells supplements his previously filed Sentencing Memorandum with the attached letters of character.

DATED: San Francisco, California
February 25, 2008

DUANE MORRIS LLP

By: s/ Joseph M. Burton
Gregory P. Gulia (GG 4215)
Joseph M. Burton (*pro hac vice*)
1540 Broadway Avenue
New York, New York 10036-4086
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EXHIBIT A

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ALSO LICENSED IN MONTANA

CARYN H. NGUYEN

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February 21, 2008

Kenneth M. Karas
US District Court Judge
South District of New York
500 Pearl Street Room 920, Court 21D
New York, NY 10007

RE: Mr. Charles Wells

Your Honor,

I am an attorney licensed in the state of Montana and California for the past eighteen years. My practice mainly consists of Sports Law, Civil Litigation, Family Law and contract negotiations. Our office represents several Olympic and professional athletes.

I was first introduced to Mr. Wells in 1993. One of my clients was his business associate at the time. As a result of that relationship we became associated and later business competitors in the athletes management business.

Through out the time I have known Mr. Wells I have witnessed many situations where someone with less character would have attempted to take unfair advantage in order to advance their own business. Mr. Wells has never done that. I have also witnessed events where Charlie did the right thing even though it would not be in his own personal best interest. He has and continues to be a good family man who has raised his children to be fine citizens and contributors to their community.

In the fifteen years I have known Charlie he has always been honest, trustworthy, fair and morally centered. A person I am proud to know and have no hesitation in standing before this court and stating such.

I would assume we have all made a mistake in judgment at some time in our lives. Mr. Wells admitted to his and has attempted to right any wrong that was caused. He has suffered public shame, financial loss and loss of the prestige he created over the many years in his chosen profession. I would hope that would be enough punishment without the State finding it necessary to also impose loss of his personal liberty as well. Mr. Wells is not a threat to society and has been punished to a great extent. No matter what the court decides, it should take these facts into consideration when determining his fate.

Thank you for your consideration and time.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'E. K. Hudson', with a long, sweeping horizontal stroke extending to the right.

Emanuel K. Hudson

EXHIBIT B

Entergy Services Inc.
639 Loyola Ave
L-ENT-15C
New Orleans, LA 70113

February 22, 2008

Judge Kenneth M. Karas
U.S. District Court
Southern District of New York
500 Pearl St., Room 920
Court 21D
New York, NY 10007

Judge Karas:

This correspondence is in reference to the character of Charles Wells. I have known Mr. Wells for approximately fourteen years during which time he has been my agent, advisor, mentor and friend. For the reasons described below, I consider Mr. Wells a man of outstanding moral and ethical character.

Charles Wells served as my agent during my entire professional career (1994-2002). We traveled together extensively during those years, attending many functions, both professional and social. During this time, Mr. Wells and I developed both a business relationship as well as a friendship. Therefore, I can speak with a high amount of credibility on Mr. Wells's character.

Mr. Wells not only exhibited strong character, but went beyond his professional call of duty to build strong character in his athletes. In a profession where disagreements on monetary matters between athletes and agents are commonplace, Mr. Wells was never, to my knowledge, accused of any wrongdoing. By routinely coordinated his athletes' participation in clinics for underprivileged kids, Mr. Wells was very instrumental in his athletes' involvement in communities around the world.

Mr. Wells also played a significant role in my professional development both on and off the track. Under his guidance, I was able to attain a gold medal in the 1996 Olympic Games. Additionally, his successes in real estate and entrepreneurship have been an inspiration. I have heeded and will continue to seek his advice on business and financial matters.

During the time that we have known each other, I have never known Mr. Wells's professional or personal character to be questioned. Though in a profession where trust is hard to earn, Mr. Wells was widely considered among the best and most reputable agents. Therefore, I am very confident in endorsing Mr. Wells as an individual of sound moral and ethical character.

Regards,

Derek Mills, Esq.
Louisiana Bar #30637

EXHIBIT C

Judge Kenneth M. Karas
U.S. District Court
Southern District of New York
500 Pearl St., Room 920
New York, NY. 10007

Dear Judge Karas:

This letter is in reference to Mr. Charles Wells a friend and colleague for over 20 years. In my tenure with Mr. Wells he has been a man of integrity and honor, he has done his job with due diligence and has been tireless in representing his clients.

I have had the privilege of traveling around the world with Mr. Wells and I can verify that he and his athletes were held in high regard and always received favorably. As a matter of fact, his group was one of the most highly favored on the international track and field circuit.

In addition, Charles has always been a good family man. His family life is solid with a loving wife and two wonderful children. It has been my pleasure to watch both of his children grow to adulthood and pursue higher education. His children represent what we all aspire for our children to be, this is an extreme compliment to Charles and his wife.

It is my hope that you will look with favor in the case of Mr. Charles Wells. He has worked very hard to reach the status he has held in his chosen profession. I have always found him to be dependable and a person you could count on for advice and counsel. He is the kind of person who wants as much for others as he wants for himself. The intent of these words is to indicate the fine person that Mr. Wells really is. He is deserving of any consideration you can give.

If I can be of any service in this matter please do not hesitate to contact me.

Sincerely,



Ernest Gregoire Ed.D.
Administrator, Emeritus
Mt. San Antonio College
2000 Olympic Coach

EXHIBIT D

**B.I.G.
SPORTS MANAGEMENT, L.L.C.**

**357 KELLER PARKWAY
SUITE A-2
KELLER, TX 76248
(817) 482-3998**

February 19, 2008

Judge Kenneth M. Karas
U.S. District Court
Southern District of New York
500 Pearl St., Room 920
Court 21 D
New York, NY 10007

Dear Judge Karas,

My name is Kevin Brown. I am writing to give you more insight of the character and person that Mr. Charles Wells truly is, from my perspective. I have known Charles for the past 14 years. Our relationship started in the beginning as a business relationship. I hired Charles as my agent in the sport of Track and Field in 1994. Upon graduating from college, it was important to my parents and I that not only someone trustworthy represents me, but someone that showed that they had a genuine interest in my development as a young man as well. From my first conversation with Charles, that was clearly understood. Our relationship grew from business to friendship quickly.

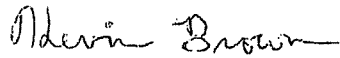
As the years of competing went by and I fought with not making the Olympic Team, I moved into a career of college coaching. I continued to rely on my relationship with Charles for advice and guidance in a career that I felt was not going anywhere. He continued to motivate me and helped me to understand why it was important for me to stick it out. He helped me to focus on having a positive influence on the lives of the young people I came in contact with everyday and that was important. I realize today that this positive influence and guidance was the same that he provided to me, and many others, from the start of our relationship to the present.

After coaching, Charles continued to assist me in my life. He provided me with an opportunity to move into the career that I have now. Along with the business of being a sports agent, he also taught me the importance of putting god, and your family first before business. I can truly say that my life as well as my family's life has changed for better due to the guidance and mentorship of Charles Wells. I feel as though I have inherited another part of my family as he and he his family has accepted us with open arms.

Although my few words don't do much justice to describe the great friend, mentor, counselor, teacher and family man that Charles Wells really is, It is my hope that I have provided you with enough information for you to see that he is a man of integrity and strong moral strength. I can say that Charles has taken responsibility himself to have a positive affect on people's lives.

If you should have any questions or concerns about the information I provided to you, feel free to contact me by phone at (817) 482-3998.

Sincerely,

A handwritten signature in cursive script that reads "Kevin Brown".

Kevin Brown
President
B.I.G. Sports Management

CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2008, I electronically filed the foregoing Sentencing Memorandum of Charles Wells using the CM/ECF system, which sent notification of such filing to the following:

E. Danya Perry
Daniel Walter Levy

danya.perry@usdoj.gov
daniel.levy@usdoj.gov

s/ Lea A. Chase
Lea A. Chase